

Elden M. Rosenthal, OSB No. 72217

elden@rgdpdx.com

John T. Devlin, OSB No. 042690

john@rgdpdx.com

Rosenthal Greene & Devlin, P.C.

121 SW Salmon St., Suite 1090

Portland, OR 97204

Telephone: (503) 228-3015

Fascimile: (503) 228-3269

Of Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

DEREK JOHNSON, personal representative
of KELLY CONRAD GREEN II, deceased;
KELLY CONRAD GREEN and SANDY
PULVER

Plaintiffs,

v.

CORIZON HEALTH, INC., a Tennessee
Corporation; LANE COUNTY, an Oregon
county; DR. CARL KELDIE, an individual;
DR. JUSTIN MONTOYA, an individual;
VICKI THOMAS, an individual; KIRSTIN
WHITE, an individual;; SHARON
EPPERSON (née FAGAN), an individual, and
JACOB PLEICH, an individual,

Defendants.

Civil Action No. 6:13-cv-01855-TC

**DECLARATION OF CHARLES
PUGH, M.D., IN SUPPORT OF
PLAINTIFFS' MEMORANDUM
IN OPPOSITION TO MOTION
FOR SUMMARY JUDGMENT
BY DEFENDANTS CORIZON
*ET AL.***

I, Charles Pugh, M.D., declare under penalty of perjury as follows:

1. I am a licensed physician, and served as the Corizon Site Medical Director in 2013 and 2014 at the Chatham County Jail in Savannah, Georgia.

2. As the Corizon Site Medical Director I was required by Corizon to submit all physician consults and emergency room transfer requests to the Regional Medical Director. During my tenure as Site Medical Director, I was constantly under pressure from my superiors in Corizon to minimize emergency room treatments and outside physician consults for jail inmates in order to save money.
3. Once or twice a week there were telephone conferences I was expected to attend with the Corizon Regional Medical Director regarding who was in the hospital and what was going on with patients in the hospital. There was a constant demand to monitor all hospitalizations, to avoid hospitalizations, to request prompt hospital discharges, and to minimize hospital stays.
4. In my experience working for Corizon, the company's constant efforts to reduce costs interfered with my ability, and with the staff's ability, to provide appropriate levels of care to inmates of the Chatham County Jail.

I hereby declare under penalty of perjury that the foregoing is true and correct.

EXECUTED ON this 30th day of January, 2015.



Charles Pugh, M.D.

CERTIFICATE OF SERVICE

I hereby certify that I served true and correct copies of the foregoing:

1. DECLARATION OF CHARLES PUGH, M.D., IN SUPPORT OF PLAINTIFFS' MEMORANDUM IN OPPOSITION TO MOTION FOR SUMMARY JUDGMENT BY DEFENDANTS CORIZON *ET AL.*

on the following:

James Daigle
Stewart Sokol & Larkin LLC
2300 SW First Ave., Suite 200
Portland, OR 97201
jmdaigle@lawssl.com

Sebastian Tapia
Lane County Counsel
125 East 8th Avenue
Eugene, OR 97401
Sebastian.tapia@co.lane.or.us

Of Attorneys for defendants.

Of Attorneys for defendants

by the following method/s:

_____ mail with postage prepaid, deposited in the US mail at Portland, OR
 X service made via electronic mailing and/or CM/ECF filing
_____ hand delivery
_____ facsimile transmission
_____ overnight delivery.

Dated this 17th day of February, 2015.

/s/ Elden M. Rosenthal
ELDEN M. ROSENTHAL, OSB No. 722174
JOHN T. DEVLIN, OSB No. 042690
Of Attorneys for Plaintiff